

Some general comments please review the report for detail comments.

#1. USDA's Farm Service Agency already has the necessary infrastructure and resources in place to implement the National Animal I.D. Program. USDA would be duplicating current capabilities within the USDA if another agency was assigned this program.. Many of the items listed within the draft plan can be done within the current USDA's Farm Service Agency. For example:

- Premises registration
- Outreach and training
- Annual Test exercises

#2. In the draft plan on page 2, under the section titled **Resources and staffing**:

The plan calls for hiring additional APHIS staff to help develop and implement NAIS. A better idea before adding additional USDA staff would be to determine what are the current assets within the USDA to implement NAIS.

#3. Livestock producers has already had experience working with the Farm Service Agency through program like the Livestock Assistance Program, Livestock Incentive Program, Emergency Feed Program, and various other farm programs. Farmers are comfortable working with the USDA-Farm Service Agency. Most of the livestock producers in the nation are familiar with the Farm Service Agency, so it would only make sense that the first point of contact for the farmer and the USDA would be the local FSA office.

#4. Current resources available within USDA's Farm Service Agency:

- Most complete name and address data base for livestock producers
- GIS capabilities. As FSA office's become GIS certified one easy layer of data that could be added would be information for each livestock operation: map location, type of livestock, number of animals, and any additional specific information that NAIS plan.
- State and County Emergency Boards – FSA is the permanent chairperson of the USDA's Emergency Board and has extensive background of working with other state and federal agencies on emergency programs.

The Farm Service Agency (FSA) has been successfully involved with agricultural producers of the United States for many years and, as such, FSA and its employees have close ties to the local producers. Working in concert with the Animal and Plant Inspection Service (APHIS), Homeland Security and private companies, FSA could ensure a private-state-federal partnership is realized and workable. This alliance could create an efficient, secure, inexpensive animal identification program (without creating a completely new tracking system) by drawing from the following strengths:

- **Location.** FSA has accessible locations in nearly every county and parish in the U.S.
- **Implementing programs.** FSA has successful track record in implementing livestock programs in times of disaster and/or economic instability. FSA has proven time and again it can implement programs of National scope quickly and

accurately, which will be critical for national security, public confidence and restoration of foreign trade.

- **Cost factor.** FSA already has the capability to provide this service with little additional cost, other alternatives could involve considerable start up costs. In addition, a new agency or field offices would not need to be established to deal with animal identification at the local level.
- **Keeping an accurate database.** FSA has 90 to 95% of all producers already in their database. We have developed a national secure internet based database that allows us to verify producer's records instantly. Once an animal has been identified and linked to a producer's ID, it can be attached to the Premise ID and a permanent record of the animal's birthplace would be readily available.
- **Quick response capabilities.** An example of FSA's quick response capabilities; a problem animal shows up at a slaughter plant to be identified, the ID would be read and immediately searched for in the national ID database either public or private. The system will provide a link between the ID tag and a Premise ID. Within a matter of minutes the county office could be contacted. Based on experimental trials the county database can be searched and the premise located within 45 seconds. If a quarantine of a specified area is required, we have the capability to draw any size radius around that farm and ID all other livestock operations within the quarantine area immediately. Producers can then be notified immediately and APHIS, state and/or local authorities can get about their work without delay. A locally maintained data layer of premise ID's will greatly enhance the ability of APHIS to meet the 48 hour trace back requirements.

In conclusion, an animal identification plan is inevitable and is needed to ensure the food security of this Country. The only question is how the government can provide the most cost effective, secure, and reliable method of supplying timely information. A "database" tied to a "Premises ID" will certainly be the foundation of any system. FSA already has that database and the local presence to make implementation and administration as convenient and efficient as possible for producers, private industry and partner state and federal agencies. As always, FSA stands ready to serve U.S. livestock producers, and if called upon will work with Animal and Plant Inspection Service, Homeland Security, State Veterinarians private companies and anyone as a willing partner on this important security and safety endeavor.

